

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,

Plaintiff

v.

CHANBOND, LLC,

Defendant.

C.A. No. 1:21-cv-01456-MN

PUBLIC VERSION

TEMPORARY RESTRAINING ORDER AND ORDER FOR EXPEDITED DISCOVERY

At Wilmington, this _____ day of _____, 2022, the Court, having considered Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction, and for Expedited Discovery, filed by Plaintiff CBV, Inc. ("Plaintiff" or "CBV") and the papers submitted in connection therewith;

Temporary Restraining Order

It appearing to the Court that CBV has demonstrated that it will suffer immediate irreparable injury in that it appears that the distribution of the Settlement Funds by Defendant ChanBond, LLC ("Defendant" or "ChanBond") prior to the resolution of this action will cause CBV to suffer immediate irreparable harm for which there is no adequate remedy at law if ChanBond is not enjoined;

It appearing that CBV has shown a likelihood of success on the merits of its claim. The Court further finds that the balance of interests in this case weighs in favor of the issuance of a temporary restraining order;

Expedited Discovery

It appearing to the Court that CBV has demonstrated that expedited discovery in this instance would be reasonable and for good cause shown;

It appearing to the Court that CBV's information requests are narrowly tailored; and,

It appearing to the Court, based on the Motion, the Complaint, and the accompanying declaration with exhibits, and Plaintiff's Memorandum of Law in Support of Its Application for a Temporary Restraining Order and Preliminary Injunction, and for Expedited Discovery, that Plaintiff's Motion for Expedited Discovery should be granted.

NOW, THEREFORE, IT IS ORDERED AND DECREED THAT:

1. Defendant ChanBond and those persons in active concert or participation with it, are restrained and enjoined from distributing the Settlement Funds to any person until CBV's Motion for Preliminary Injunction is adjudicated in favor of ChanBond.

2. This Temporary Restraining Order is issued pursuant to Federal Rule of Civil Procedure 65(b) and shall expire when the Motion for Preliminary Injunction comes on for hearing, unless within such time the Order, for good cause shown, is extended or unless Defendant consents that it may be extended for a longer period.

3. Plaintiff CBV shall give security in the sum of \$5,000.

4. In accordance with the directives included in Plaintiff's Motion, Plaintiff's Motion for Expedited Discovery is GRANTED. Defendant ChanBond shall produce:

(a) All documents and/or communications concerning ChanBond's agreement with [REDACTED] related to the Settlement Funds;

(b) [REDACTED]

5. A hearing on Plaintiff's Motion for Preliminary Injunction is set for _____, 2022, at _____.

This ____ day of _____, 2022.

UNITED STATES DISTRICT JUDGE
MARYELLEN NORIEKA